

Exhibit A

Summary of Relief Sought in Trustee's Motion for Turnover of Property of the Estate (Dkts. 450, 494)

<u>PRE-PETITION ASSETS</u>			
<u>Asset</u>	<u>Exemption</u>	<u>Status</u>	<u>Relief Requested</u>
<i>\$60,000 Pre-petition Receivable owed to Gauri by Operating Subsidiaries (Dkt. 21, Sch. B, line 30; Sch. C.)</i>	Post-conversion the Debtor amended his schedules to claim that the \$60,000 constituted unpaid wages and that 85% of the amount due was exempt pursuant to the Illinois Wage Garnishment statute. (See Dkt. 288; see also Dkt. 313, Sch. A/B.)	Debtor received \$60,000 post-conversion.	Turnover of \$60,000 if this is a receivable. Turnover of \$9,000 if the \$60,000 is found to constitute wages.
<i>\$33,900 in Pre-petition Tax Refunds</i>	No exemption claimed.	Debtor received \$33,900 post-petition, pre-conversion.	Turnover of \$33,900.
<i>Land Rover Vehicle Purchased on Eve of Chapter 11 Filing</i>	No exemption claimed.	Debtor has possession.	Turnover of Land Rover.

Summary of Relief Sought in Trustee's Motion for Turnover of Property of the Estate (Dkts. 450, 494)

<u>WAGES EARNED DURING THE CHAPTER 11 CASE BUT NOT PAID TO DEBTOR AS OF CONVERSION OF THE CASE TO CHAPTER 7</u>			
<u>Asset</u>	<u>Exemption</u>	<u>Status</u>	<u>Relief Requested</u>
<i>\$105,362.84¹ in Post-petition Wages Earned During the Chapter 11 Case and Paid Post-Conversion</i>	Claims exemption (disputed—see <i>In re Meier</i> , 550 B.R. 384, 386-90 (N.D. Ill. 2016); <i>In re Sullivan</i> , 567 B.R. 348, 356 (Bankr. N.D. Ill. 2017))	Debtor received post-conversion.	Turnover of \$105,362.84.

<u>WAGES EARNED AND PAID DURING THE CHAPTER 11 CASE AND SPENT BY DEBTOR IN EXCESS OF REASONABLE LIVING EXPENSES</u>			
<u>Asset</u>	<u>Exemption</u>	<u>Status</u>	<u>Relief Requested</u>
<i>\$457,208.96² in Post-petition Wages Earned During the Chapter 11 Case and Paid During his Chapter 11 Case</i>	Claims exemption (disputed—see <i>In re Meier</i> , 550 B.R. 384, 386-90 (N.D. Ill. 2016); <i>In re Sullivan</i> , 567 B.R. 348, 356 (Bankr. N.D. Ill. 2017)).	Debtor spent \$519,363.13 in this case—an amount in excess of reasonable expenditures. Trustee's estimate of reasonable spending during the chapter 11 case (based on the means test) is \$86,200.	Turnover of \$371,008.96 (total assets received, minus deduction for reasonable living expenses).

¹ This figure is based on calculations prepared by the Debtor.

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